

**Before the  
FEDERAL COMMUNICATIONS COMMISSION  
Washington, DC 20554**

In the Matter of	)	
	)	
Federal-State Joint Board on	)	
Universal Service	)	CC Docket No. 96-45
	)	
A Review of the Definition of	)	
Universal Service	)	
	)	

**Comments of the Alaska Telephone Association**

**Introduction**

In an order released on December 21, 2000, the Federal Communications Commission directed the Federal-State Joint Board on Universal Service to review the definition of universal service and to review Lifeline and Link Up service.<sup>1</sup> Previously, the Commission adopted “core” services recommended by the Joint Board based on consideration of the four criteria set forth in section 254(c)(1) of the Telecommunications Act of 1996.<sup>2</sup> It is this list of nine “core” services eligible for universal service support (single-party service; voice grade access to the public switched telephone network; local usage; Dual Tone Multifrequency signaling or its functional equivalent; access to emergency services; access to operator services; access to interexchange service; access to directory assistance; and toll limitation services for qualifying low-income

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<sup>1</sup> *Federal-State Board on Universal Service*, CC Docket 96-45, Order, 15 FCC Rcd 25257 (2000) (Referral Order).

<sup>2</sup> *Federal-State Board on Universal Service*, CC Docket 96-45, Report and Order, 12 FCC Rcd 8776, 8807-36 (released May 8, 1997). The definition of supported universal services shall consider the extent to which they “are essential to education, public health or public safety; have, through the operation of market choices by customers, been subscribed to by a substantial majority of residential customers; are being deployed in public telecommunications networks by telecommunications carriers; and are consistent with the public interest, convenience and necessity.”

consumers)<sup>3</sup> that the Joint-Board is directed to consider and, if warranted, offer recommendations for modification.

### **Advanced or High-Speed Services**

Along with the many complex, confusing and untenable aspects of the Telecommunications Act of 1996, its authors were visionary in recognizing that the definition of universal service should be an evolving one. In the few years since the passage, nowhere has that evolution been more clearly apparent than in the demand for advanced and high-speed services. However, that demand has not been satisfied in all rural areas for the same reasons that cause the cost of basic telecommunications to be proportionately high; distance, terrain, weather, and thin populations.

In practice, affordable speeds in rural Alaska don't approach the definition of high-speed (over 200 kbps in at least one direction) or advanced services (at least 200 kbps in both directions).<sup>4</sup> The realistic aspirations of most Alaskans are not for the definitional standard of these services, but for something better than that which is readily accessible today.

We would be happy to offer our thoughts on the justification for universal service support for advanced and high-speed services under section 254(c)(1), however in footnote 7 of the Referral Order, the Commission specifically states that it will not “consider the creation of new universal service mechanisms to promote broadband deployment....”<sup>5</sup> We know that the cost of providing high-speed and advanced services

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<sup>3</sup> Id. at para. 56-87.

<sup>4</sup> *Inquiry Concerning the Deployment of Advanced Telecommunications Capability to all Americans in a Reasonable and Timely Fashion, and Possible Steps to Accelerate Such Deployment Pursuant to Section 706 of the Telecommunications Act of 1996*, CC Docket Number 98-146, Second Report, 15 FCC Rcd 20913, 2019-20.

<sup>5</sup> See *Referral Order*, para. 3, n.7.

in rural areas will continue to be significant. We also recognize that the cost of not providing these services will be high. These services should receive consideration for inclusion as “core” services meriting universal service support, but that consideration should take place when the funding source may also be permitted as a topic of discussion.

Although we don’t venture to recommend the inclusion of high-speed and advanced services for universal service support in these comments, we believe that coordination of the Schools and Libraries and Rural Health Care programs with the customer demand for broadband deployment would contribute to the goal of “affordable” bandwidth. It is also imperative that infrastructure funded by the Schools and Libraries and Rural Health Care programs be made available on a competitively neutral basis to local Internet service providers. Excess capacity paid for by public funds should not be available exclusively for distribution by the contracting carrier.

When the Commission is prepared to consider the funding mechanisms, we will encourage the Commission to explore opportunities for funding advanced services including opening access to infrastructure funded by “e” rate and Rural Health Care programs to multiple providers.

## **Conclusion**

The Alaska Telephone Association appreciates this opportunity to reconsider the definition of universal service and the “core” services that are deemed eligible for support. The companies that comprise this association, and their customers, strongly support the principles of universal service. We believe that rural America should have affordable access to high-speed and advanced services and that that circumstance will reasonably be attained only through the coordinated efforts of Federally mandated

programs in conjunction with locally operated Internet service providers to assure efficient use of bandwidth with the goal of extending broadband access to all Americans.

We remain ready and willing to work with the Joint-Board on Universal Service, the Commission, and our State commission to bring the wonders and benefits of the most advanced telecommunications services to all Americans, but until the issue of a funding source is also open for discussion, consideration of the inclusion of high-speed and advanced services within the list of “core” services is moot.

Respectfully submitted,

ALASKA TELEPHONE ASSOCIATION

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By: \_\_\_\_\_  
James Rowe  
Executive Director

Alaska Telephone Association  
201 E. 56<sup>th</sup>, Suite 114  
Anchorage, Alaska 99518

(907) 563-4000  
*[www.alaskatel.org](http://www.alaskatel.org)*